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**UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON**

**LORI BELL**, an individual,

Plaintiff,

v.

**CLACKAMAS COUNTY**, a local government,  
and **GREG GEIST**, an individual,

Defendants.

**CASE NO. 3:22-cv-01885-MO**

**REPORT OF PARTIES RULE 26  
CONFERENCE**

1. Pursuant to FRCP 26(f) , the parties conferred on the contents of this proposed discovery plan on February 13, 2023.
2. The parties jointly propose the following discovery plan:
  - a. Initial Disclosures pursuant to LR 26-7 due 30 days after Defendants' Answer, which is expected to be filed this week;
  - b. Fact discovery to be completed by August 17, 2023;
  - c. Dispositive motions, if any, to be filed by September 28, 2023;
  - d. Joint ADR Report due 30 days after rulings on summary judgment or, if no dispositive motions are filed, 30 days after the dispositive motion deadline;
  - e. Expert disclosures due 90 days prior to trial, with counter-designations of

rebuttal experts due 60 days prior to trial.

3. Consent to Magistrate: The parties discussed this topic and will file any consent forms in the appropriate manner by March 1, 2023.

DATED this 13<sup>th</sup> day of February, 2023.

s/Matthew C. Ellis

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s/Sarah D Foreman

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